

**Fighting for Employee Justice**



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January 30, 2025

**VIA ECF**

The Honorable Arun Subramanian  
United States Magistrate Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: Primitivo Robles v. Two Buds Enterprise, Inc., d/b/a Two Buds Dispensary  
1:24-cv-07586(AS)**

Honorable Judge Subramanian,

We represent Plaintiff, Primitivo Robles in the above-referenced Americans with Disabilities Act (ADA) matter, currently pending in the Southern District of New York. Pursuant to this Court's Order dated January 17, 2025, Plaintiff was instructed to seek default against Defendant within two weeks. However, yesterday, January 29, 2025, we were contacted by the Defendant and have begun preliminary discussions about settlement and litigation in this matter. Defendant has not yet retained the services of counsel.

We respectfully request an adjournment of Plaintiff's time to move for default and Defendant's time to Answer for an additional 30 days to allow the parties to either continue settlement discussions or to afford Defendant time to retain counsel and interpose an answer.

Thank you for your time and consideration.

Sincerely,  
**JON L. NORINSBERG, ESQ., PLLC**

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